

## Mullin, Michelle

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**From:** Mullin, Michelle  
**Sent:** Thursday, September 26, 2019 2:41 PM  
**To:** Castrilli, Laura  
**Cc:** Bartus, Dave  
**Subject:** RE: draft email to usei FW: PCB Process Building

Thanks, Laura. Just two minor suggestions below in green. I added a date 60 days out for them to provide the data regarding PCBs on the steel or in the surrounding soil, because if there is a release it will need to be managed quickly. 60 days is a quick TAT, but not overly aggressive. I also suggested changing the date by which they let us know when they will make a decision regarding the building to Jan 1. It seems like if all we are asking them is for a future date when they'll be able to make a decision, it shouldn't take them 6 months to come up with that date. Lastly, I added the same date to when they should let us know about their TSCA renewal application schedule. Again, they should be able to provide us a date for a future decision relatively quickly, I think. Let me know if you disagree. I'm taking a position here of holding them to a little faster TAT in letting us know what is going on. If 60 days is unreasonable for all of these answers, I figure they can always push back and ask for an extension. But this explosion happened a long time ago, it's time to at least know what the plan is.

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**Michelle Mullin** | PCB Coordinator and Team Leader | pronouns: she, her  
**U.S. Environmental Protection Agency | Region 10**  
Land, Chemicals and Redevelopment Division  
1200 6<sup>th</sup> Avenue | Ste 155  
Seattle, WA 98101  
**p: 206.553.1616** | [mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov)

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**From:** Castrilli, Laura <Castrilli.Laura@epa.gov>  
**Sent:** Thursday, September 26, 2019 2:18 PM  
**To:** Mullin, Michelle <Mullin.Michelle@epa.gov>  
**Cc:** Bartus, Dave <Bartus.Dave@epa.gov>  
**Subject:** draft email to usei FW: PCB Process Building

So did some more research after lunch and drafted the following. Let me know if you think this is a good approach or if I should modify. I plan to be in the office Monday, Perhaps we can talk then if you have time.

Rebecca, I understand from our subsequent conversation that the collapsed roof and walls have been disposed of in a PCB landfill unit, leaving just the riveted steel floor/foundation. I talked with our PCB coordinator regarding the PCB Process Building and also looked at the closure plan in Appendix 6 of the TSCA approval. The original plan was to clean the building for future re-use or to dismantle the building and dispose of it in a PCB landfill cell. Since the building was not cleaned prior to collapse, there is concern whether PCB contamination has affected the remaining floor/foundation and also the surrounding soils.

Please provide a report **[Mullin, Michelle]** by **January 1, 2020** showing that the surrounding soils have not been impacted by PCBs from the unanticipated collapse and removal of most of the building before it could be cleaned. The report must also include data showing that the remaining steel floor is not a source of potential further contamination or that the potential for further contamination has been mitigated. If mitigation steps were taken, please include details of the mitigation and associated periodic inspection steps that will be undertaken in order to ensure continued mitigation.

Regarding retaining the ability to reconstruct the PCB Processing Building at a later date, the EPA would like to create a schedule for making this determination so that there is some expectation of eventually reconstructing the building or determining final closure steps for the remaining floor/foundation. Ideally, if the building will not be reconstructed, the

EPA would like to see the safe re-use or re-smelting of the steel floor as opposed to disposal into a PCB landfill cell. However, we do understand that for business purposes, it may be preferable to simply dispose of the steel in the PCB landfill, in accordance with the current closure plan. Please let us know if USEI will be able to make a business decision on whether to rebuild or proceed with completing closure by **[Mullin, Michelle]** by January 1, 2020 . This date is a proposed decision date, not a completion date.

We understand USEI is working with IDEQ to rebuild the hazardous waste treatment building so it may be at least six months before USEI is ready to re-engage on finalizing the TSCA renewal application. Please let us know **[Mullin, Michelle]** in your January 1, 2020 submittal what a reasonable schedule for re-starting this effort would be.

Laura Castrilli  
(206) 553-4323; [castrilli.laura@epa.gov](mailto:castrilli.laura@epa.gov)  
Land, Chemicals & Redevelopment Division  
EPA Region 10; 1200 Sixth Ave., Suite 155, MS 15-H04; Seattle, WA 98101-3188

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**From:** Rebecca Hogaboam <[rebecca.hogaboam@usecology.com](mailto:rebecca.hogaboam@usecology.com)>  
**Sent:** Monday, September 16, 2019 2:13 PM  
**To:** Bartus, Dave <[Bartus.Dave@epa.gov](mailto:Bartus.Dave@epa.gov)>; Castrilli, Laura <[Castrilli.Laura@epa.gov](mailto:Castrilli.Laura@epa.gov)>  
**Cc:** Jason Evens <[jason.evens@usecology.com](mailto:jason.evens@usecology.com)>; Karlita Simper <[karlita.simper@usecology.com](mailto:karlita.simper@usecology.com)>  
**Subject:** PCB Process Building

Hello:

As you know, the PCB Process Building sustained significant structural damage and eventually collapsed due to this damage and sustained high winds at USEI during the month of January. USEI would like to continue to retain the ability to reconstruct the PCB Process Building at a later date. The estimated date for rebuilding is still unknown at this time. For approval application purposes, would it be acceptable to say that the building is currently out of service? Is there some other language that we would need to use instead?

Thank you,

**Rebecca Hogaboam**  
EH&S Compliance Manager

[rebecca.hogaboam@usecology.com](mailto:rebecca.hogaboam@usecology.com)  
p: 208.834.2275 ext. 2344  
PO Box 400, Grand View, ID 83624

*Emergency Response: 800.839.3975  
Customer Service: 800.274.1516*



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